

### **REMARKS/ARGUMENTS**

Claims 1-100 were pending in the application. Claims 1, 29, 57, 87, and 98 have been amended. Claims 5, 33, and 61 have been canceled. Therefore, claims 1-4, 6-32, 34-60, and 62-100 are now pending.

Independent claims 1, 29, 57, 87, and 98 were amended to require that the pre-computed recovery path(s) be installed in the forwarding table along with the primary path(s), essentially encompassing dependent claims 5, 33, and 61, which were canceled. As discussed in the application, by pre-computing recovery paths and installing the recovery paths in the forwarding table along with the primary paths, the recovery paths are available in the event of a network change. With the recovery paths already in the forwarding table, a recovery path can be easily activated, for example, by removing the primary path from the forwarding table, blocking the primary path in the forwarding table, or marking the recovery path as a higher priority path than the primary path in the forwarding table.

The concept of installing recovery paths in the forwarding table along with the primary paths is neither taught nor suggested by Baskey (US Patent No. 6,148,410). Rather, Baskey relates to synchronization of information across different nodes (FTR-CRs), one of which is a primary node and another of which is a backup node that is activated when needed. With reference to Baskey at col. 4, lines 54-67, which was the basis for the rejection of claim 5, it is clear that Baskey does not install recovery paths in a forwarding table along with primary paths, but instead synchronizes the data and tables of the active and standby routers so as to dispense with the need to reconstruct configuration information of the primary router by the backup router when the primary router fails. In essence, then, Baskey switches between separate synchronized nodes in order to bypass a failure, whereas in the present invention as claimed, a failure is bypassed using a pre-computed and pre-installed recovery path within a node.

Thus, Applicants respectfully submit that independent claims 1, 29, 57, 87, 98 are allowable over Baskey. Because a dependent claim is deemed to include all of the limitations of its base claim and any intervening claim, dependent claims 2-4, 6-28, 30-

32, 34-56, 58-60, 62-86, 88-92, 99, and 100 are also allowable over Baskey. Claims 4, 32, and 60 are expressly allowable over Mann (US Patent No. 6,314,093).

Independent claim 93 requires freezing forwarding tables so that a predetermined set of routes is used during reconvergence and reconverging on a new set of routes while the forwarding tables are frozen. With reference to Baskey at col. 3, lines 40-67 and col. 8, lines 1-39, which was the basis for the rejection of claim 93, there is simply nothing in Baskey to indicate that internal forwarding tables are frozen during reconvergence and that the routers reconverge on a new set of routes while the forward tables are frozen. Col. 8, lines 1-39 describes two techniques for performing IP takeover, one using ARP (the Address Resolution Protocol) and the other using the IP routing protocol to advertise the VEC IP address. Neither of these involves reconvergence of routes.

Thus, Applicants respectfully submit that independent claim 93 is allowable over Baskey. Because a dependent claim is deemed to include all of the limitations of its base claim and any intervening claim, dependent claims 94-97 are also allowable over Baskey.

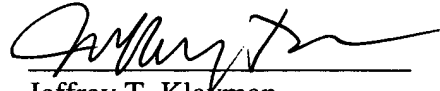
The drawings were amended by replacement of the original drawings with formal drawings, as required by the Examiner. Please note that formal drawings were submitted on March 9, 2001, prior to publication of the application.

All pending claims are believed to be in a form suitable for allowance, and objection of the drawings has been overcome. Therefore, the application is believed to be in a condition for allowance. The Applicants respectfully requests early allowance of the application. The Applicants requests that the Examiner contact the undersigned, Jeffrey T. Klayman, if it will assist further examination of this application.

The Applicants do not believe any extension of time is required for timely consideration of this response. In the event that an extension has been overlooked, this conditional petition of extension is hereby submitted, and Applicants request that deposit account number 19-4972 be charged for any fees that may be required for the timely consideration of this application.

Date: June 21, 2004

Respectfully submitted,



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